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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT CALIFORNIA  
WESTERN DIVISION**

CENTER FOR BIOLOGICAL  
DIVERSITY; WISHTOYO  
FOUNDATION,

*Plaintiff,*

V.

DOUG BURGUM, et al.,

*Federal Defendants,*

SABLE OFFSHORE CORP.,

*Intervenor-Defendants.*

Case No. 2:24-cv-05459-MWC-MAA

# FIRST DECLARATION OF BOBBY KURTZ

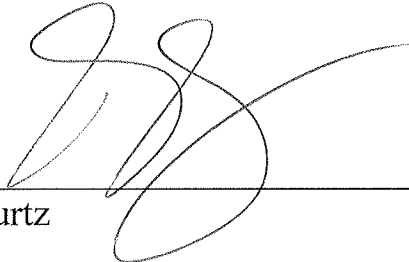
I, Bobby Kurtz, declare that if called as a witness in this action I would competently testify of my own personal knowledge as follows:

1. I serve as the Acting Director for Pacific Outer Continental Shelf Region with the Bureau of Safety and Environmental Enforcement (BSEE).
2. I submit this declaration in support of the Memorandum in Support of Federal Defendants' Motion for Summary Judgment and in Opposition to Plaintiffs' Motion for Summary Judgment in the above-captioned case. The facts stated herein are based upon my personal knowledge and information.
3. Attached as **Exhibit 1** are true and correct copies of the End of Operations Reports submitted by Sable Offshore Corp. and accepted by BSEE on October 22, 2024, and January 2, 2025. These Reports correspond to the Applications for Permit to Modify ("APMs") submitted by Sable to BSEE on September 19, 2024, at issue in this case.
4. Attached as **Exhibit 2** is a true and correct copy of the Sable Offshore Corporation Lease Extension of Santa Ynez Unit Environmental Assessment, dated May 2025.
5. Attached as **Exhibit 3** is a true and correct copy of the Finding of No Significant Impact associated with the ExxonMobil/Sable Offshore Corporation Lease Extension of Santa Ynez Unit Environmental Assessment, dated May 28, 2025.
6. Attached as **Exhibit 4** is a true and correct copy of the BSEE Decision Letter Superseding the November 14, 2023, Approval for the October 19,

2023, Request for Extension to Resume Operations and attachments, dated May 29, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this the 30<sup>th</sup> day of May 2025.

  
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Bobby Kurtz